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May 12, 2021

Via ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

MEMO ENDORSED

Re: *Safe Passage Project v. U.S. Customs and Border Protection, et al.*, 1:21-cv-03288-VEC
Joint Request for Adjournment of Initial Pretrial Conference

Dear Judge Caproni:

On behalf of the parties, Plaintiff writes to respectfully request that the Court adjourn the initial pretrial conference in the above referenced matter, currently scheduled for May 21, 2021 at 11:30 am by teleconference, and the filing of the joint letter, currently due on May 13, 2021, for one month. This is the parties' first request for an adjournment of the initial pre-trial conference.

Parties request that the conference is adjourned to permit the parties to seek to resolve claims raised in this action, brought under the Freedom of Information Act (FOIA). *See* ECF No. 1 at 7. Counsel for Defendant states that Defendant U.S. Citizenship and Immigration Services anticipates producing documents responsive to Plaintiff's FOIA request by no later than three weeks from today, June 2, and will try to produce earlier. Counsel for Defendant states that Defendant U.S. Customs and Border Protection is evaluating Plaintiff's FOIA request and will provide an update shortly.

Parties request that the conference is adjourned for one month and propose that the conference is re-scheduled on June 18, 2021 or June 25, 2021.

Respectfully submitted,

s/ Kristin Macleod-Ball

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cc: Rebecca Friedman, Counsel for Defendants

Application GRANTED. The initial pretrial conference is adjourned to **June 25, 2021 at 10:00 a.m.** The parties' joint submission is due by **June 17, 2021.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 3288.

SO ORDERED.



5/12/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE